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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA ENG-HATCHER, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

SPRINT NEXTEL CORPORATION;
SPRINT/UNITED MANAGEMENT
COMPANY; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO.07-CV-7350 (BSJ)(KNF)

**DECLARATION OF GERALD D.
WELLS, III IN SUPPORT OF
PLAINTIFF'S REPLY
MEMORANDUM OF LAW IN
FURTHER SUPPORT OF
PLAINTIFF'S MOTIONS FOR (1)
CONDITIONAL COLLECTIVE
CERTIFICATION; (2) COURT
AUTHORIZED NOTICE; (3)
PRODUCTION OF NAMES AND
ADDRESSES PURSUANT TO 29
U.S.C. § 216(b); AND (4) CLASS
CERTIFICATION PURSUANT TO
FED. R. CIV. P. 23**

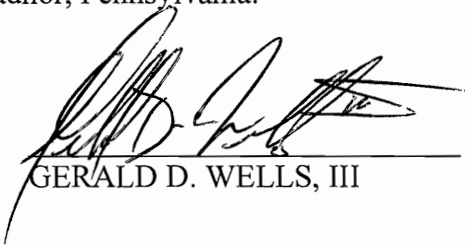
I, GERALD D. WELLS, III, declare as follows:

1. I am an associate at the law firm of Schiffrin Barroway Topaz & Kessler, LLP (“SBTK” or the “Firm”). I am personally involved in all aspects of the prosecution of this matter. I submit this Declaration in support of Plaintiff’s Reply Memorandum in Support of Plaintiff’s Motions for (1) Conditional Collective Certification Pursuant to 26 U.S.C. § 216(b); (2) Court Authorized Notice; (3) Production of Names and Addresses to facilitate Collective Certification Notice; and (4) Class Certification Pursuant to FED. R. CIV. P. 23.

2. Attached hereto as Exhibit A is a true and correct copy of an email from James Mickey, dated February 4, 2005. The document is Bates Stamped SPRMEH-002915-002924.

3. Attached hereto as Exhibit B is a true and correct copy of a memorandum from Laura McLaughlin, dated March 4, 2006.¹

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 6, 2008, in Radnor, Pennsylvania.



GERALD D. WELLS, III

¹ This document was produced by Defendants in a format whereby the date of the memorandum adjusts each time the document is accessed. Consequently, the date of August 6, 2008 is not the correct date. The correct date is March 4, 2006. See Declaration of Gerald D. Wells, III in Support of Plaintiff’s Motions For (1) Conditional Collective Certification Pursuant to 26 U.S.C. § 216(b); (2) Court Authorized Notice; (3) Production of Names and Addresses to Facilitate Collective Certification Notice; and (4) Class Certification Pursuant to FED. R. CIV. P. 23, Exhibit E, Deposition Transcript of Kim Dixon at p.52:7-11.

EXHIBIT A

FILED UNDER SEAL

EXHIBIT B

FILED UNDER SEAL